

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Northern District of New York

UNITED STATES OF AMERICA )

v. )

Case No. 1:25-MJ-203 )

YORMAN GONZALEZ COTE, )

Defendant. )

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of July 7, 2025 in the county of Saratoga in the Northern District of New York the defendant violated:

*Code Section*

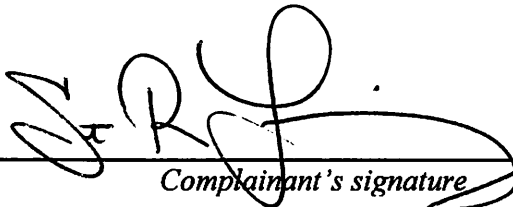
18 U.S. Code § 1546(a)

*Offense Description*

Possession of a Fraudulent U.S. Social Security Card

This criminal complaint is based on these facts:  
See Attached Affidavit.

☒ Continued on the attached sheet.

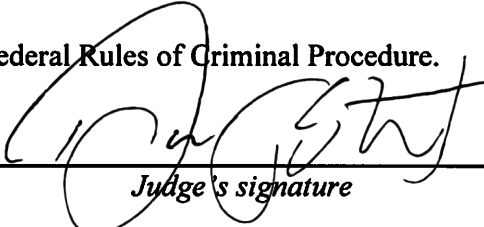

*Complainant's signature*

Steven Lansing, HSI SA

*Printed name and title*

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: July 8, 2025


*Judge's signature*

City and State: Albany, New York

Hon. Daniel J. Stewart, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Steven Lansing, being duly sworn, do hereby depose and state as follows:

1. I am a Special Agent with the U.S. Immigration and Customs Enforcement Office of Homeland Security Investigations (HSI) and have been since 2020. In this role, I have participated in a number of investigations involving fraudulent documents, including social security cards.

2. On July 7, 2025, Yorman Gonzalez Cote reported for an immigration check in at ICE Albany's Office located at 11 Old Stonebreak Road, Malta, New York 12020, which is in Saratoga County in the Northern District of New York.

3. ICE Enforcement and Removal Operations officers arrested Gonzalez Cote for a custody redetermination in his immigration case. They then conducted a search incident to arrest of his person and located a wallet. Several identification documents were inside the wallet, including debit cards in his name, a Colombian identification card bearing his photograph and biographical information, a document that appears to be a United States of America Permanent Resident Card bearing the name "Yorman Cote," and a document that appears to be a social security card bearing the name "Yorman Cote." A copy of the front and back of this document is below.



This CARD belongs to the Social Security Administration and you must keep it in a safe place. Return it if we ask for it.

If you find a card that isn't yours, please return it to:  
Social Security Administration  
P.O. Box 33008, Baltimore, MD 21290-3008

For any other Social Security business/information, contact your local Social Security office. If you write to the above address for any business other than returning a found card, you will not receive a response.

Social Security Administration  
Form SSA-3000 (6-99)

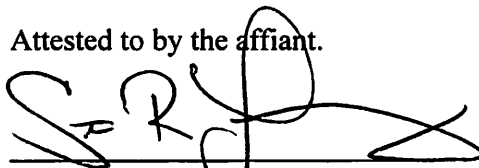
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4. I entered the number that appears on this document into various law enforcement databases. I have previously used these databases and found them to reliably confirm whether biographical information, including social security numbers, are associated with a given person. My queries into these databases returned no matches. Based on my training and experience, I know this means that the number is not a valid social security number.

5. Based on my training and experience, I know that social security cards are prescribed by statute and regulation as evidence of authorized employment in the United States.

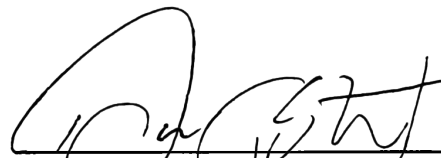
6. Based on the above, I submit that there is probable cause to conclude that on July 7, 2025, Yorman Gonzalez Cote violated 18 U.S.C. § 1546(a) in Saratoga County in the Northern District of New York by knowingly possessing a forged, counterfeit, and falsely made document prescribed by statute and regulation as evidence of authorized employment in the United States, that is a social security card.

Attested to by the affiant.



Steven Lansing  
HSI Special Agent

I, the Honorable Daniel J. Stewart, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on July 8, 2025, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Honorable Daniel J. Stewart  
United States Magistrate Judge  
Northern District of New York